

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

JOHN DOE,

Plaintiff,

v.

KRISTI NOEM, *et al.*

Defendants.

DECLARATION

Case No: 2:25-cv-00633

**DECLARATION OF JOHN DOE
DESCRIBING IRREPARABLE HARMS**

DECLARATION OF JOHN DOE

I, John Doe, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My pseudonym is John Doe. I am over 18 years of age, have personal knowledge of the facts stated herein, and am competent to testify to these facts. I am a citizen of China and currently reside in King County, Washington.
2. I am a Ph.D. candidate at the University of Washington ("UW"). I was notified by the UW DSO that my SEVIS status was terminated on April 7, 2025. After the temporary restraining order was issued, my SEVIS status was changed to active on April 21, 2025.
3. The reason stated in SEVIS for my termination was in part "failing to maintain status" due to being an "individual identified in a criminal records check and/or has had their VISA revoked." In the notice I received about my SEVIS termination, it was explained that "all employment authorization, on- or off- campus must end immediately since your SEVIS record is no longer in an active status."

- 1 4. I have been working in a research lab on-campus at the UW. As a result of the SEVIS
2 termination, my employment was immediately terminated and I was no longer able to access
3 any of the research, equipment or other materials needed for my projects. As a result, I was
4 immediately unable to continue work on my dissertation and thesis.
- 5 5. When I asked for advice on what “failing to maintain status” meant, I was told that I was out
6 of status and not allowed to stay in the United States.
- 7 6. I was immediately consumed by fear about what would happen next. I have seen many news
8 articles about foreign students in the United States having their status terminated this year
9 and then being picked up off the streets by ICE and detained without bail. All of my plans
10 and hard-work were immediately put into jeopardy. My plans to graduate in December and
11 earn my Ph.D. were jeopardized, I worried that I would lose all of my research, hard work,
12 and publishing opportunities. My plans with my fiancée to marry this summer and our
13 fertility plans were immediately jeopardized.
- 14 7. Due to the overwhelming stress of having my SEVIS status terminated, I started to suffer
15 from acute abdominal pain. I was afraid of seeking medical care to treat this pain because my
16 insurance is dependent on my on-campus employment and I feared that I may be picked up
17 and detained by ICE if I went outside. I only sought treatment for my pain after my
18 temporary restraining order was granted. When I went to urgent care for the pain the hepatic
19 results showed an abnormality. I have been referred to a specialist and am waiting for my
20 appointment to be scheduled. If my SEVIS status is terminated again, I would unable to do
21 that appointment.
- 22 8. I have also experienced many other harms due to my SEVIS status being terminated and can
23 explain them on request.
- 24 9. I have read DHS’s new notice on SEVIS termination. I fear that under the new notice that I
25 could be terminated again at any time for the reasons written in my April 7, 2025 SEVIS
26 termination record. The notice says I can be put into removal proceedings for having my visa
27 revoked and the termination record says my visa may have been revoked despite it having
28 already expired. The notice says that I can have my SEVIS status terminated again for any

1 reason. I am left with great uncertainty about my rights and status in the United States and
2 fear that my status will be terminated again without a legitimate reason or notice. Without
3 adequate assurances that the government will not terminate my SEVIS status again or place
4 me in removal while my lawsuit is ongoing, I will continue to suffer high levels of fear and
5 anxiety that will interfere with my research, my family, and my career.

6 10. After my TRO was issued, I worked with my advisors to figure out how I could complete my
7 research and studies as soon as possible in order to minimize additional risks. We agreed that
8 it is possible to fast track my program, with some additional work to be done after I graduate,
9 to allow me to receive my degree on June 13, 2025. However, if my status is terminated
10 again, I will not even be able to do that as another termination will immediately jeopardize
11 my ability to complete my research in this shortened period of time.

13 **Impacts on Critical Research and Related Systems**

14 11. I have three research manuscripts that are in late-stage revision and under review at journals.
15 If DHS terminates my SEVIS record again, it will immediately make it very difficult, if not
16 impossible, for me to complete experiments necessary to finish my manuscripts and to
17 conduct experimental work to respond to reviewer comments required for revisions. Without
18 status, I am not able to access the UW's secure [REDACTED] database that forms the
19 foundation of my dissertation research and pending publications. As a result, it would be
20 unlikely for me to be able to finish and publish my manuscripts, which would have a major
21 negative impact on my career. Even a short-term interruption would have an immense impact
22 on my ability to complete my work, it cannot simply wait for another restraining order to be
23 issued if my SEVIS record is terminated again.

24 12. I was accepted to present in person an abstract at the [REDACTED]
25 [REDACTED] meeting in [REDACTED] States on May 14
26 this year. Due to the temporary nature of my temporary restraining order, I have had to forfeit
27 in-person attendance, which would have allowed me to directly talk and collaborate with
28 other researchers in my field. It is important for my career to be able to work and talk in

1 person with other researchers. If I was had a guarantee that DHS would not terminate my
2 student status while I traveled within the United States, pick me up at an airport, detain me,
3 and put me in removal proceedings, I could notify the conference that I am available to
4 present in person. I was hoping for a preliminary injunction so I could make that request
5 today, but the more time that passes the less likely I will be able to change from sending a
6 video to presenting in person.

7 13. I am directly responsible for managing and implementing software upgrades for my lab's
8 multi-million dollar [REDACTED] I am currently planned to implement system upgrades in
9 June that I coded. The upgrades cannot simply be rescheduled. If my SEVIS status is
10 terminated again, I will not be able to do the upgrades and they will be delayed while
11 someone else is trained to do them. As a result, my uncertainty around student status and
12 potential of having my SEVIS terminated again would immediately halt the planned system
13 upgrades and prevent [REDACTED] from being scanned with advanced technology. That would
14 further delay collection of [REDACTED] data necessary to meet current research timelines.

15 14. I am also provide essential technical support to [REDACTED] using specialized software that was
16 developed in our lab. Without my continued involvement, [REDACTED] will lose access to
17 technical troubleshooting and custom modifications that enable them to analyze [REDACTED] data
18 for both research and [REDACTED] decision-making.

20 Career Harm

21 15. On April 16, 2025, I accepted an offer as a Research Scientist at Meta Platforms, Inc.
22 conditioned on my receiving post-completion OPT. I have been warned that any additional
23 SEVIS termination will cause the company to withdraw its offer, because it cannot employ
24 someone lacking work authorization or who is unable to guarantee their daily availability. If
25 the offer is rescinded, I will lose the beginning of my post-graduate research path and will
26 have no obvious path to comparable U.S. or foreign employment.

27 16. OPT is a one-time benefit tied to my current degree program. If my OPT is cancelled,
28 refused, or delayed past graduation due to SEVIS termination, I will permanently lose the

1 chance to translate my doctoral research into industry applications in the United States. Any
2 further SEVIS termination will immediately result in my being unable to continue on this
3 career course.

4 **Financial Harm**

5 17. My research stipend is the only source of income and it covers 100% of my graduate tuition,
6 health insurance, and person costs. When my SEVIS status was terminated, it was
7 immediately placed on hold. Should my SEVIS status be terminated again, I will
8 immediately lose the stipend and be unable to pay my monthly rent and medical expenses,
9 and would no longer be able to afford food, utilities, and other basic necessities. As a result, I
10 would be forced to return to China and abandon my degree.
11

12 **Family Planning and Fertility Harm**

13 18. My fiancée is a lawful permanent resident and software engineer. We have been planning to
14 marry in Hawaii this summer. Because we cannot predict when DHS might terminate my
15 status and detain me, we fear we will have to postpone our wedding indefinitely.

16 19. My fiancée and I have concerns about our fertility. We want to have children together. In
17 anticipation of our wedding, we had started fertility treatments. This process requires us to
18 not undergo excessive stress, which interferes with fertility treatments. Due to the risk of
19 another SEVIS termination, we are having to change our fertility plans and are discussing
20 long-term options that include reproductive storage so that we may try to have a child later.
21 We do not want my fiancée to have to undergo the same stress and ordeal of being pregnant
22 and becoming a single mother while I am detained. We have read the recent story of
23 Mahmoud Khalil a graduate from Columbia University whose wife, Dr. Noor Abdalla, has
24 had to endure the last month of her pregnancy and birth of their child without him. At the
25 same time, we know that if we delay our fertility plans too much it will be highly unlikely
26 for us to be able to ever have children. Furthermore, if I am placed in removal proceedings
27 and detained then we will definitely be unable to pursue our fertility plans.
28

1 20. Finally, my fiancée and I have both experienced significant stress since my April 7, 2025
2 SEVIS termination. My fiancée has been seeing a counselor to work through it and I am now
3 scheduled to see one as well. Termination of my SEVIS status would end my health
4 insurance coverage and make me unable to continue treatment to deal with the extreme stress
5 caused by these events.

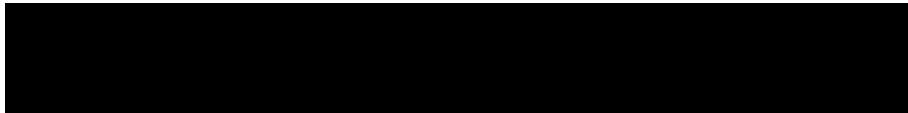
6 21. Attached to this declaration are true copies of the following exhibits:

7 Exhibit D: Notice of Accepted Abstract for Conference.

8 Exhibit E: Pacific Northwest Fertility Patient Information Form.

9
10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12
13 Executed on May 2nd, 2025, in Seattle, Washington.

14 

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16 John Doe (signature on file with counsel)